

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION**

ROYCE SOLOMON, et al., individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

AMERICAN WEB LOAN, INC., et al.,

Defendants.

Civil Action No. 4:17-cv-0145-HCM-RJK

CLASS ACTION

**SETTLEMENT CLASS COUNSEL’S MOTION FOR  
AN AWARD OF ATTORNEYS’ FEES, REIMBURSEMENT OF EXPENSES,  
AND SERVICE AWARDS FOR THE SETTLEMENT CLASS REPRESENTATIVES**

The Settlement Class Counsel<sup>1</sup> hereby move the Court, pursuant to Fed. R. Civ. P. 23, for an Order awarding attorneys’ fees, reimbursement of litigation expenses, and service awards for the Settlement Class Representatives and for entry of the attached proposed Order.

In support of this motion, Plaintiffs are filing contemporaneously with this motion a memorandum in support with the following exhibits:

1. Exhibit 1 – Declaration of Professor Charles Silver on the Reasonableness of Class Counsel’s Request for an Award of Attorneys’ Fees, dated September 1, 2020;
2. Exhibit 2 – Declaration Of Royce Solomon In Support Of Plaintiffs’ Motion For Final Approval Of Class Action Settlement And Class Counsel’s Motion For An Award Of Attorneys’ Fees, Reimbursement Of Expenses, And Service Awards To The Settlement Class Representatives, dated August 28, 2020;
3. Exhibit 3 – Declaration of Jodi Belleci Theye In Support Of Plaintiffs’ Motion For Final Approval Of Class Action Settlement And Class Counsel’s Motion For An Award

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<sup>1</sup> Unless otherwise defined herein, capitalized terms shall have the meanings ascribed to them in the Settlement Agreement dated April 14, 2020 (the “Settlement Agreement”), attached as Exhibit A to the Memorandum in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement (ECF No. 414).

Of Attorneys' Fees, Reimbursement Of Expenses, And Service Awards To The Settlement Class Representatives , dated August 28, 2020;

4. Exhibit 4 – Declaration of Giulia Lomaglio In Support Of Plaintiffs' Motion For Final Approval Of Class Action Settlement And Class Counsel's Motion For An Award Of Attorneys' Fees, Reimbursement Of Expenses, And Service Awards To The Settlement Class Representatives, dated September 2, 2020;
5. Exhibit 5 – Declaration of Michael Littlejohn In Support Of Plaintiffs' Motion For Final Approval Of Class Action Settlement And Class Counsel's Motion For An Award Of Attorneys' Fees, Reimbursement Of Expenses, And Service Awards To The Settlement Class Representatives, dated August 31, 2020;
6. Exhibit 6 – Declaration of Kathleen M. Donovan-Maher on Behalf of Berman Tabacco In Support of Class Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses, dated September 4, 2020 ("Donovan-Maher Decl.").
7. Exhibit 7 – Declaration of Matthew B. Byrne on Behalf of Gravel & Shea PC In Support of Class Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses, dated August 27, 2020 ("Byrne Decl.").
8. Exhibit 8 – Declaration of David Thomas on Behalf of MichieHamlett PLLC In Support of Class Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses, dated September 4, 2020 ("Thomas Decl.").
9. Exhibit 9 – Declaration of David Frederick on Behalf of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. In Support of Class Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses, dated August 26, 2020 ("Frederick Decl.").
10. Exhibit 10 – Summary Table of the Lodestar and Expenses of Class Counsel.

In further support of this motion, Plaintiffs are filing contemporaneously herewith the Joint Declaration of Kathleen M. Donovan-Maher and Matthew B. Byrne in Support of (A) Plaintiffs' Motion for Final Approval of Class Action Settlement and (B) Class Counsel's Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Service Awards to the Settlement Class Representatives.

Defendants do not oppose the filing of this motion.

DATED: September 4, 2020

**MICHIEHAMLETT**

/s/ David W. Thomas

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*Settlement Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4th day of September, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

/s/ David W. Thomas  
David W. Thomas, Esq.